

NORGAARD O'BOYLE
184 Grand Avenue
Englewood, New Jersey 07631
Telephone Number (201) 871-1333
Facsimile Number (201) 871-3161
Attorneys for Debtor
By: BRIAN G. HANNON, ESQ.
BH - 3645

_____	:	UNITED STATES BANKRUPTCY COURT
In re:	:	FOR THE DISTRICT OF NEW JERSEY
	:	NEWARK VICINAGE
ROBERT NUNZIATO	:	
	:	
	:	Chapter 13
Debtor.	:	
_____	:	Case No. 17-15431 (RG)

**CERTIFICATION IN SUPPORT OF DEBTOR'S
OPPOSITION TO THE STANDING TRUSTEE'S MOTION TO DISMISS CASE**

Brian G. Hannon, Esq. certifies as follows:

1. I am a member of Norgaard O'Boyle, counsel to the Debtor in the above-referenced matter. I write this certification in opposition to the Standing Trustee's certification of default for an order dismissing this case.
2. Debtor will be filing a modified chapter 13 plan to extend the length of the Chapter 13 so that all claims can be paid in full.
3. The Debtors monthly payment is \$500 a month. As the Debtor's plan is currently only scheduled for 36 months and as the outstanding amount of all allowable claims is approximately \$24,000, the Debtor can feasibly extend the plan to once again pay all creditors in full.
4. The Debtor is current with all trustee payments.
5. For the aforementioned reasons the Standing Trustee's certification of default for an

order to dismiss the case should be denied.

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

Dated: 2/15/18

/s/ Brian G. Hannon
Brian G. Hannon, Esq.